



Proskauer Rose LLP Eleven Times Square New York, NY 10036-8299

June 8, 2023

Via CM/ECF

The Honorable Gabriel W. Gorenstein
U.S. District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007

Mark W. Batten
Member of the Firm
d +1.617.526.9850
f 617.526.9899
mbatten@proskauer.com
www.proskauer.com

Re: *Donna Wood, et al. v. Mike Bloomberg 2020, Inc.*, No. 20 Civ. 2489 (LTS) (GWG)

Dear Judge Gorenstein:

We represent Defendant Mike Bloomberg 2020, Inc. (the “Campaign”) in the above-referenced matter. Pursuant to Rule 2.E of this Court’s Individual Practices and the Stipulated Confidentiality Agreement and Protective Order entered in this action (Dkt. 169, the “Protective Order”), the Campaign respectfully submits this application for leave to file portions of its June 8, 2023 letter reply (the “Letter Reply”) in further support of the Campaign’s motion to compel deposition testimony of Plaintiff Tristan Angulo (Dkt. 350, 352, 354) under seal.

The Campaign’s June 8 Letter Reply, filed herewith, concerns a discovery dispute between the parties. The Letter Reply references and quotes May 8, 2023 deposition testimony of Named Class Representative Tristan Angulo from portions which Plaintiffs designated as confidential and identified as needing to be filed under seal, pursuant to the Protective Order. The Campaign has also redacted references to the underlying subject matter of the testimony that Plaintiffs designated as Confidential, in an abundance of caution.

Pursuant to Rule 2.E of this Court’s Individual Practices, and the Protective Order, because Plaintiffs have designated the material as Confidential, Plaintiffs must submit the application explaining why the sealing of deposition testimony and/or any related references to its subject matter is justified. The deposition testimony quoted and referenced in the Letter Reply include pages 55-66 and 139-143 of Mr. Angulo’s deposition transcript. Other than related references to the testimony which the Campaign has redacted, the remaining contents of the Letter Reply are to be filed publicly.

For the foregoing reasons, the Campaign respectfully requests that the Court grant the Campaign’s motion for leave to file under seal pending the Court’s decision on Plaintiffs’ application to the Court to justify the proposed sealing.

The Campaign thanks the Court for its attention to this matter.



Respectfully submitted,

/s/ Mark W. Batten

Mark W. Batten

cc: All Counsel of Record (via CM/ECF)